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*Attorneys for Defendants State of Nevada,
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

VICTOR PEREZ, as Special Administrator
of the Estate of CARLOS PEREZ,
deceased; VICTOR PEREZ, as Guardian
Ad Litem for S.E.P., a minor; VICTOR
PEREZ, as Guardian Ad Litem for A.I.P., a
minor,

Plaintiffs,

vs.

STATE OF NEVADA, ex.rel. NEVADA
DEPARTMENT OF CORRECTIONS;
DIRECTOR GREG COX, individually;
WARDEN DWIGHT NEVEN, individually;
ASSISTANT WARDEN TIMOTHY
FILSON, individually; COT. RAMOS,
individually; LIEUTENANT OLIVER,
individually; CORRECTIONS OFFICER
CASTRO, individually; CORRECTIONS
OFFICER SMITH, individually; and
DOES I-X, inclusive; and ROES I-X,
inclusive,

Defendants.

CASE NO. 2:15-cv-01572-APG-DJA

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
SUBMISSION OF JOINT PRETRIAL
ORDER
(Fourth Request)**

Pursuant to LR IA 6-1, 6-2 and LR 26-4, Defendant Isaiah Smith, by and through
his counsel of record Jeffrey F. Barr, Esq. and Alina M. Shell of the law firm of Armstrong

1 Teasdale LLP; Plaintiff Victor Perez, as Special Administrator of the Estate of Carlos
2 Perez, deceased, by and through his counsel, Paola M. Armeni, Esq., of the law firm of
3 Clark Hill; Defendants, State of Nevada ex rel. Nevada Department of Corrections, James
4 Greg Cox, Timothy Filson, Dwight W. Neven and Ronald Oliver, by and through their
5 counsel, Kiel B. Ireland, Esq., of the Attorney General's Office; Defendant Raynaldo Ramos,
6 by and through his counsel, Robert W. Freeman, Jr. Esq., of the law firm of Lewis Brisbois
7 Bisgaard & Smith, LLP; and Defendant Jeff Castro, by and through his counsel, Craig R.
8 Anderson, Esq., of the law firm of Marquis Aurbach Chtd, submit this Stipulation and
9 Order Extending the Deadline for Submission of Joint Pretrial Order currently due on
10 December 12, 2022 an additional 14 days. Because December 26, 2022 is a federal holiday,
11 the new deadline would be December 27, 2022.

12 This Court previously denied a joint unopposed motion to extend the deadline for
13 submission of the Joint Pretrial Order on September 19, 2022, and then granted a modified
14 version of the same request. ECF No. 221, 223. It then granted another stipulated
15 extension. ECF No. 227. Hence, this is the fourth request for an extension.

16 This stipulated request for an extension is made in good faith and not for the
17 purposes of delay. All parties have been diligently working on their portions of the joint
18 pretrial order and have completed their respective sections. However, the parties need a
19 short extension to integrate the different proposals and complete a joint pretrial order that
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all parties can agree to. This joint pretrial order is more complicated than most because the parties must navigate the conflicting factual and legal positions of five sets of separately represented parties.

WHEREFORE the parties stipulate that the time for parties to submit the joint pretrial order be extended an additional 14 days, up to and including December 27, 2022.

Dated this 9th day of December, 2022.

AARON D. FORD
Attorney General

Dated this 9th day of December, 2022.

CLARK HILL, PLLC

By: /s/ Kiel B. Ireland
Craig Newby (Bar No. 8591)
Chief Litigation Counsel
Kiel B. Ireland (Bar No. 15368C)
Deputy Attorney General
Attorneys for Defendants
Cox, Filson, Neven, and Oliver

By: /s/ Paola A. Armeni
Paola M. Armeni (Bar No. 8357)
Attorneys for Plaintiffs

Dated this 9th day of December, 2022.

LEWIS, BRISBOIS, BISGAARD,
& SMITH, LLP

Dated this 9th day of December, 2022.

ASHCRAFT & BARR, LLP

By: /s/ Robert W. Freeman
Robert W. Freeman, Esq.
Attorneys for Defendant
Raynaldo-John Ramos

By: /s/ Jeffrey F. Barr
Jeffrey F. Barr, Esq.
Alina M. Shell
Attorneys for Defendant
Isaiah Smith

Dated this 9th day of December, 2022.

MARQUIS & AURBACH

By: /s/ Craig R. Anderson
Craig R. Anderson, Esq.
Attorney for Defendant
Jeff Castro

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE
DATED: 12/12/2022